

TO: **Mail Stop 8**
Director of the U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

**REPORT ON THE
 FILING OR DETERMINATION OF AN
 ACTION REGARDING A PATENT OR
 TRADEMARK**

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court _____ of the Southern District of Texas, Houston Division _____ on the following

☐ Trademarks or ☒ Patents. (☐ the patent action involves 35 U.S.C. § 292.):

DOCKET NO. 4:12-cv-811	DATE FILED 3/16/2012	U.S. DISTRICT COURT of the Southern District of Texas, Houston Division
PLAINTIFF Regent Markets Group, Ltd		DEFENDANT UBS AG
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 7,206,762		A copy of the complaint is being mailed with this form.
2 8,046,292		
3 8,046,293		
4		
5		

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY	
		<input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1		
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3		
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK

DAVID J. BRADLEY

(BY) DEPUTY CLERK



DATE

4/4/2012

Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
 Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

REGENT MARKETS GROUP, LTD.

Plaintiff,

vs.

UBS AG

Defendant.

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Civil Action No. 4:12-cv-00811

JURY TRIAL DEMANDED

**PLAINTIFF REGENT MARKETS GROUP, LTD.'S
ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Regent Markets Group, Ltd. ("Regent") files this Original Complaint for patent infringement against UBS AG ("UBS") alleging as following:

THE PARTIES

1. Plaintiff, Regent is a company organized under the laws of Jersey (Channel Islands) with its principal places of business in Malta, the Isle of Man, and Malaysia.
2. Upon information and belief, UBS is a Swiss corporation with headquarters in Basel and Zurich, Switzerland. UBS may be served with this Complaint through its registered agent, Corporation Service Company d/b/a CSC - Lawyers Incorporating Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

3. This is an action for infringement of a United States patent. Accordingly, this action arises under the patent laws of the United States of America, 35 U.S.C. § 1 *et seq.*, and jurisdiction is properly based on 35 U.S.C. § 271 and 28 U.S.C. § 1338(a).

4. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, the Defendant has offices in this district, transacts or has transacted business in this judicial district, or committed and/or induced acts of patent infringement in this district. These purposeful acts and/or transactions in Texas are such that UBS should reasonably know and expect that it could be hailed into a Texas court.

INFRINGEMENT OF U.S. PATENT NOS. 7,206,762; 8,046,292; and 8,046,293

5. On April 17, 2007, United States Patent No. 7,206,762 (the “‘762 patent”) was duly and legally issued to Jean-Yves Sireau (“Sireau”) for an invention titled “Betting System and Method”. On or about December 13, 2000, Mr. Sireau assigned all rights, title, and interest in and to the ‘762 Patent to Fixed-Odds Group Ltd, a Bahamas corporation. Subsequently, Fixed-Odds Group Ltd. changed its name to Regent Markets Group Ltd., and subsequently re-domiciled to Jersey (Channel Islands). Regent remains the sole assignee of the ‘762 Patent. A true and correct copy of the ‘762 Patent is attached hereto as Exhibit A. On October 25, 2011, United States Patent Nos. 8,046,292 (the “‘292 Patent”) and 8,046,293 (the “‘293 Patent”) were duly and legally issued to Mr. Sireau. True and correct copies of the ‘292 and ‘293 Patents are attached hereto as Exhibits B and C respectively. Both the ‘292 and ‘293 Patents were assigned to Regent Markets Group Ltd. The ‘762, the ‘292, and the ‘293 Patents (collectively, the “Regent Patents”) all relate to systems and methods for operating fixed-odds betting systems.

6. Pursuant to 35 U.S.C. § 282, the Regent Patents are presumed valid.

7. To the extent necessary, Plaintiff has complied with the notice and marking requirements of 35 U.S.C. § 287.

8. The Regent Patents relate generally to a fixed-odds betting system and, more specifically, to a method and system for buying and selling of fixed-odd financial bets wherein

the system calculates the fixed odds for a bet based on input from a user and data relating to a financial market.

9. Regent Markets Group is a leading international financial betting company, offering a wide range of fixed-odds financial bets on foreign exchange rates, stock indices, stocks, and commodities. The company was founded in October 1999 by Mr. Sireau, who first conceived of the idea of developing an automated betting system and method for offering fixed-odds financial bets over the internet. Mr. Sireau's work culminated in a European Patent Application filed in March 2000 and subsequently that year the launch of Regent Market Group's internet betting website and system. Since that time, Regent Markets Group has grown into a multinational firm, transacting over \$150 million of fixed-odds financial bets per annum with thousands of clients worldwide.

10. UBS Investment Bank is the investment banking business of UBS AG, a holding company based in Zurich, Switzerland. UBS's Investment Bank division offers derivatives products to clients such as corporations, governments, and institutional investors. These derivatives products include the UBS FX Trader Plus trading platform, which provides users with an online platform for customization, pricing, and execution of vanilla and exotic forex options, including binary and fixed-odds bets.

11. UBS, upon information and belief, has infringed and continues to infringe the Regent Patents by its manufacture, use, sale, and/or offer for sale of UBS FX Trader Plus trading platform. UBS infringes one or more claims of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293 either literally or under the doctrine of equivalents. UBS also contributes to and induces others to manufacture, use, sell, import, and/or offer for sale products and services that

infringe the Regent Patents. UBS is liable for its infringement of the Regent Patents pursuant to 35 U.S.C. § 271.

12. UBS has violated and continues to violate 35 U.S.C. § 271 (a), (b), (c), and (f). Specifically, UBS has continued to make, use, sell, and offer to sell products that infringe the claims of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293. UBS also continues to contribute to and induce infringement by others, without a license under the Patents.

13. Accordingly, UBS's acts of infringement of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293, as alleged above, have injured Plaintiff and thus, Plaintiff is entitled to recover damages adequate to compensate it for UBS's acts of infringement, which in no event can be less than a reasonable royalty.

14. UBS's acts of infringement are causing irreparable harm and damage to Regent.

JURY DEMAND

15. Plaintiff hereby demands a jury trial on all claims and issues.

PRAAYER FOR RELIEF

A. Plaintiff seeks a declaration that UBS has infringed and continues to infringe United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293.

B. Plaintiff seeks an award of damages arising out of Defendant's infringement of United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293, including enhanced damages pursuant to 35 U.S.C. § 284, together with prejudgment and post-judgment interest, in an amount according to proof.

C. Plaintiff seeks an award of its attorney fees, costs, and expenses pursuant to 35 U.S.C. § 285 or as otherwise permitted by law.

D. Plaintiff seeks an order permanently enjoining UBS and its respective officers, agents, employees and those acting in privity with it, from further infringement of United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293.

E. Plaintiff seeks such other and further relief as the Court may deem just and proper.

DATED: March 16, 2012

Respectfully submitted,

/s/ Edward W. Goldstein

Edward W. Goldstein – Attorney-in-Charge
Texas Bar No. 08099500

Southern District of Texas Bar No. 586

Gregg L. Goldstein

Texas Bar No. 24044908

Southern District of Texas Bar No. 625033

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ATTORNEYS FOR PLAINTIFF

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

REGENT MARKETS GROUP, LTD.

(b) County of Residence of First Listed Plaintiff N/A
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Goldstein & Lipski PLLC, 1177 West Loop South, Suite 400
Houston, Texas 77027, 713-877-1515

DEFENDANTS

UBS AG

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Label & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395b) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DW/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat. TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity)
35 U.S.C. § 1

Brief description of cause:
Patent Infringement

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**

CHECK YES only if demanded in complaint.

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE Lynn N. Hughes

DOCKET NUMBER 4:12-cv-00425

DATE

03/16/2012

SIGNATURE OF ATTORNEY OF RECORD

/s/ Edward W. Goldstein

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RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____